

3. Although the bulk of my time spent in prosecuting the case was spent on my client's discharge claims (upon which my client did not prevail), I have reviewed my

contemporaneous time records and I am respectfully requesting that the Court allow \$1203.00 in attorneys fees and costs as set forth below.

## **II. My Background**

4. I received a BS in Applied Mathematics from Stanford University in 1992 and a JD from Columbia Law School in 1997. I was admitted to practice in New Jersey in 1997 and subsequently admitted in New York. I worked as an associate with major international law firms from 1997 to 2002 and have substantial experience in federal litigation. Since 2002 I have worked as a solo practitioner, practicing primarily in the area of labor and employment law and have prosecuted numerous wage and hour cases.

## **III. The Litigation of this Matter**

5. I have worked on this matter since approximately 2007 when I was retained by my client, Ms. Strohl.

6. I have reviewed my contemporaneous time records and I believe it would be reasonable to attribute 40 minutes of attorney time to my client's wage claim. In particular, my time records disclose two items which I submit are relevant here:

Dec-30-08 Draft opposition papers re: motion for summary judgment (3.1);

Jan-04-09 Meet with client and prepare opposition papers including Strohl Affidavit (4.6).

7. Of the 7.7 hours disclosed above, I would estimate that approximately 40 minutes was spent on my client's wage claim.

8. I am also respectfully requesting an additional 20 minutes for time spent preparing this Application, for a total of 1 hour.

9. I have extensive experience prosecuting wage and hour cases.

10. I believe that \$300 per hour is reasonable given my extensive experience and qualifications. Thus I am seeking \$300 in attorneys fees.

11. I am also seeking \$903 in disbursements - the initial filing fee and the fee for an interpreter for my client at trial. Documents substantiating these disbursements are attached hereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ David Abrams (DA-8126)

David Abrams, Attorney at Law  
Attorney for Plaintiff  
Y. Strohl  
299 Broadway, Suite 1700  
New York, NY 10007

Dated: September 16, 2010  
New York, New York

A062 SWEDA

(Rev. 4-90)

ORIGINAL

348388

RECEIPT FOR PAYMENT  
UNITED STATES DISTRICT COURT  
for the  
EASTERN DISTRICT OF NEW YORK  
at BROOKLYN

## Fund

6855XX Deposit Funds  
604700 Registry Funds  
General and Special Funds  
508800 Immigration Fees  
085000 Attorney Admission Fees  
086900 Filing Fees  
322340 Sale of Publications  
322350 Copy Fees  
322360 Miscellaneous Fees  
143500 Interest  
322380 Recoveries of Court Costs  
322386 Restitution to U.S. Government  
121000 Conscience Fund  
129900 Gifts  
504100 Crime Victims Fund  
613300 Unclaimed Monies  
510000 Civil Filing Fee (1/2)  
510100 Registry Fee

01-17-2008(THU) 02:10 Pm

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CASE REFERENCE: 08 CV 259

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January 19, 2010

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In the matter of: STROHL -v-  
BRITE ADVENTURE

LWA-23050

DEPOSITION taken at FEDERAL COURT US EASTERN DISTRICT OF NY,  
225 CADMAN PLAZA EAST, BROOKLYN, NY, , on January 13, 2010 .

For Spanish interpreting by PAULA PIZZI:

Interpretation for YAJAIRO STROHL.

7.0 hours

553.00

called 1/22/10  
spoke to Angel

gave Amy

Appr 194158

\$553.00

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